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June 22, 2018

**VIA ECF, EMAIL, AND FEDERAL EXPRESS**

Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Room 723  
New York, NY 10004-1408

Dear Judge Bernstein:

We are counsel to Irving H. Picard, as Trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff.

We write with regard to the Order entered by your Honor on June 8, 2018, ECF No. 17646, directing the Trustee to file a list of all Bad Faith Actions in which discovery is complete, the adversary proceeding is ready for trial and will not be affected by the outcome of any currently pending appeals.

A review of the Trustee's pending actions reveals no cases that fall within those specific parameters. Of the 29 Bad Faith Actions pending, 7 are currently in discovery. In the remaining 22 cases, discovery has not yet commenced. A list of pending Bad Faith Actions is attached for the Court's convenience.

We are always available to the Court should your Honor require any additional or different information.

Respectfully submitted,

*/s/ David J. Sheehan*

David J. Sheehan

Enclosure